

Comments to the petition: RM-10521

A petition to allow "visiting/transient/tourist non-amateur non-United States resident foreign nationals" unlicensed access to certain frequencies between 446.0 and 446.1 MHz.

It is my position that I oppose the petition for the following reasons:

1. There are areas in the United States that are prone to high concentration of tourists and foreign nationals on vacation. (For example Disney World in Orlando, FL & Anaheim, CA etc)
2. Those high concentrations of tourists using special "FRS" radios unlicensed on 446 MHz would be a possible interference threat to Amateur Radio Emergency Service Volunteers in the likelihood that there was an emergency need for communication during a disaster or civil disobedience event.
3. Those areas where there is a high concentration of tourists also pose a high probable terrorist target location, which leads to the likelihood that the FRS radios on 446 would see heavy use during a time when the Amateur Radio Emergency Service Volunteers need the frequency open.
4. The availability and low cost of FCC approved FRS radios in the United States would not be a burden or inconvenience for tourists or foreign nationals to purchase for their use while touring in this country. The use of foreign radios that are not approved by the FCC would therefore interfere with free enterprise in the United States causing less need for the purchase of those radios approved for sale. This at a period when the economy of the United States should not be undermined for the convenience of foreign nationals or tourists.

Respectfully submitted this 17th day of August 2002

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CC: 1. Mr. Keith Kotch, KF4BXT Emergency Coordinator
2. ARRL government affairs branch